



MEMORANDUM

TO: Toni Jones, U.S. Environmental Protection Agency
FROM: Eastern Research Group, Inc.
DATE: November 21, 2011
SUBJECT: Economic Impact Analysis: Reconsideration Proposal Inputs Comparison

An economic impact analysis for existing CISWI units was conducted at promulgation, using inputs presented previously in a separate memorandum.¹ During the reconsideration process, changes were made to the CISWI inventory, emission limits, and control cost calculations. Almost all of these changes occurred within the energy recovery unit and waste-burning kiln subcategories of CISWI units. Consequently, the inputs used for analyzing economic impacts have changed as well. This memorandum compares the economic impact inputs used at promulgation to the inputs used for the reconsideration analyses.

CHANGES IN ECONOMIC INPUTS

Table 1 shows the list of facilities in the CISWI inventory and their corresponding lowest cost compliance options at the final rule (February 2011), reconsideration proposal, and the difference between both estimates. For reconsideration, five facilities (14 units) were added to the inventory (these are indicated in red text), and five facilities (7 units) were removed from the inventory (these are indicated in gray). Three of the facilities removed from the inventory were small entities.

Over all existing units, the total cost of the lowest cost option increased by \$268 million in capital costs and \$53 million in annual costs. As shown in Table 1, much of this increase can be attributed to the compliance costs for the 14 units that were added to the inventory (none of which belong to small entities).

For small entities that remain in the CISWI inventory, costs are the same at reconsideration as they were at promulgation. The three small entities that were removed from the inventory decreased the overall small entity costs by \$43 million in capital costs and \$20 million in annual costs.

REFERENCES

1. "Revised Economic Impact Analysis Inputs for Existing CISWI Units" Memorandum from Eastern Research Group, Inc. to Toni Jones, U.S. Environmental Protection Agency. January 12, 2011.